Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In Re:	
Delete, Delete, Delete	GN Docket No. 25-133
CTIA Petition for Rulemaking	RM-12003
Promoting Consumer Choice and Wireless Competition Through Handset Unlocking Requirements and Policies	WT Docket No. 24-186
Modernizing Unbundling and Resale Requirements in an Era of Next-Generation Networks and Services	WC Docket No. 19-308
Establishing the Digital Opportunity Data Collection	WC Docket No. 19-195
Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment	WC Docket No. 17-84
Technology Transitions	GN Docket No. 13-5
Modernizing the FCC Form 477 Data Program	WC Docket No. 11-10
Former Nextel Communications, Inc. Upper 700 MHz Guard Band Licenses and Revisions to Part 37 of the Commission's Rules	WT Docket No. 06-169
Service Rules for the 698-746, 747-762 and 777-792 MHz Bands	WT Docket No. 06-150

COMMENTS OF VERIZON[1]

[1] The Verizon companies participating in this filing are the regulated, wholly owned subsidiaries of Verizon Communications Inc.

The Commission's recent commitment to "review its rules to identify and eliminate those that are unnecessary in light of current circumstances" is a hugely important exercise that could help unlock investment and innovation by removing or modifying regulations that cause more harm than good. Public Notice[2] at 1. As the Public Notice suggests, there are many existing rules that, in light of current marketplace circumstances and experience, impose unnecessary burdens and impede providers from investing in the new, innovative service offerings that consumers demand. Verizon is at the forefront of those efforts to replace legacy services and legacy networks with modern, IP-based fiber and wireless networks. Unnecessary regulatory burdens hamper Verizon's ability to achieve those ends, which will benefit consumers and fulfill the promise of the Communications Act.

The comments that USTelecom and CTIA are filing in response to the Public Notice detail a broad range of rules that qualify for deletion or modification under the criteria set out in the Public Notice, and we fully support those recommendations. Verizon files these comments to highlight a few of the unnecessary rules where Verizon has particular experience. First, the Commission should eliminate the "C-Block Rule," 47 C.F.R. § 27.16, which imposes unique open-access regulations on the holders of this specific block in two spectrum bands. The concerns that drove the adoption of that rule in 2007 have not materialized. And today's wireless marketplace is fiercely competitive and wireless technologies are light years ahead of where they were nearly 20 years ago, yet the C-Block Rule continues to impose unique burdens on a subset of providers (primarily Verizon) that impedes competition.

Second, the Commission should build on its recent orders streamlining the discontinuance and network change notification processes. Even with those welcome changes,

[2] Public Notice, *Delete, Delete, Delete*, DA 25-219, GN Docket No. 25-133 (Mar. 12, 2025) ("Public Notice").

the discontinuance rules still have the effect of requiring telephone companies with copper networks to maintain those networks—despite consumer preferences and demands calling for fiber and wireless networks and the high-speed broadband services they are capable of delivering.[3] As a result, carriers have to maintain and operate two networks, which drains resources away from delivering broadband. Eliminating or further streamlining the network discontinuance rules will enable carriers to focus on delivering the services that consumers demand today.

Third, while accurate and up-to-date broadband maps remain important, the Commission should eliminate rules that impose costs that far exceed the marginal benefits of the data they provide. These include the requirements to create in-vehicle coverage maps and to have certifications related to mapping data come from licensed professional engineers. Requiring both stationary and in-vehicle maps doubles the number of maps wireless providers must create, adding costs and complexities to both the mapping and challenge processes, while increasing customer confusion. And the Commission has repeatedly recognized the shortage of licensed professional engineers, waiving the requirement multiple times and recently—and correctly—proposing to eliminate it.

Fourth, the deployment of new wireless network facilities—to densify existing deployments, to serve new communities, and to roll out new wireless technologies—is essential to achieving the Commission's statutory mission to facilitate the ubiquitous deployment of broadband to all Americans. In a recent petition for rulemaking, CTIA has identified numerous ways the Commission can eliminate the unnecessary red tape and barriers to deployment that its

[3] At this point, more than three-quarters of adults live in wireless-only households. *See* National Health Interview Survey Early Release Program at 1, *Wireless Substitution: Early Release of Estimates from the National Health Interview Survey, July-December 2023* (rel. June 2024), https://www.cdc.gov/nchs/data/nhis/earlyrelease/wireless202406.pdf.

existing rules implementing the National Environmental Policy Act ("NEPA") cause. Verizon supports that petition and urges the Commission to move promptly to grant it and make the rule revisions CTIA proposes.

Finally, the Commission should streamline or eliminate rules in 47 C.F.R. Part 51, including those that hold together the last vestigial parts of the obsolete and nearly unused unbundled network element regime.

I. The Commission Should Eliminate the C-Block Rule

Cost-benefit considerations. The costs of the C-Block Rule far outweigh any benefits. The Commission adopted the C-Block Rule in 2007, at the urging of Google and others, as an experiment in subjecting new wireless licenses to open-access regulations.[4] At that early stage of the smartphone era, the Commission was concerned about early practices that suggested some providers may constrain consumer access to wireless broadband networks, devices or applications. In particular, the Commission noted that the then-new "Apple iPhone device" was designed initially to work exclusively on one provider's (AT&T's) network.[5] In the 18 years since, however, these concerns have not materialized and instead the wireless market demonstrates openness and robust competition enabling consumer choice for services, devices, and applications. Of course, the iPhone has long been available for use on all major wireless networks and other advanced smartphones and tablets also compete for consumers. Providers compete vigorously on multiple dimensions, including the speed, performance, and reach of their

[4] Second Report and Order, *Former Nextel Communications, Inc. Upper 700 MHz Guard Band Licenses and Revisions to Part 27 of the Commission's Rules*, FCC 07-132, WT Docket No. 06-169 (Aug. 10, 2007) ("*Second C-Block Order*"); *see id.* ¶¶ 41, 191 ("For example, Google maintains that the only way to guarantee new broadband platforms is through open platform requirements: open applications, open devices, open services, and open networks.").

[5] *Id.* ¶ 190.

networks. And there is a huge, open, and competitive ecosystem of applications that work across devices, networks, and providers. The C-Block Rule was not the reason why the marketplace has developed in this way.

The Commission enacted the C-Block Rule as a real-world experiment, and recognized at that time that the rule might have unintended negative effects. In the 18 years since, the evidence —including the record in the *Unlocking NPRM*[6]—has vindicated these concerns. The C-Block Rule has harmed consumers and competition. The rule applies only to a minority of wireless providers (mainly Verizon), creating an unlevel playing field in a critical U.S. industry. For example, one of the C-Block Rules—the Unlocking Rule, 47 C.F.R. § 27.16(e)—requires Verizon (and not other major wireless providers) to unlock mobile devices within 60 days. This short period contrasts with an industry standard for prepaid service of at least six months, and for postpaid service a requirement that the device is first paid in full. This has made Verizon a prime target of international criminal rings who obtain heavily subsidized devices in the U.S. through illicit means and then sell them at a significant profit in other parts of the world. For example, one iteration of this is for fraudsters to buy mobile devices on credit only to ship them abroad and resell them without first paying off the phone in the United States. These types of device trafficking schemes cost Verizon and its customers hundreds of millions of dollars annually, while impeding access to subsidized devices for legitimate consumers, particularly low-income consumers.[7]

Experience gained from implementation of the rule. The Commission has already recognized that at least some aspects of the C-Block Rule, as originally adopted, have caused

[6] Notice of Proposed Rulemaking, *Promoting Consumer Choice and Wireless Competition Through Handset Unlocking Requirements and Policies*, 39 FCC Rcd 8111 (2024).

[7] *See* Comments of Verizon in WT Docket No. 24-186.

more harms than benefits. For example, the Unlocking Rule originally prevented Verizon from locking its phones for any period of time. In 2019, however, the Commission granted a partial waiver of the rule to implement a 60-day locking period.[8] When it granted Verizon a waiver of the locking ban, the Bureau recognized that the harms to consumers and to Verizon "associated with identity theft and related forms of handset fraud are significant."[9] The 60-day locking period has proved more effective at deterring some types of bad behavior than none at all, but it still has made Verizon and its customers the prime target for fraud. For example, even with a 60-day locking period, Verizon estimates that it lost 784,703 devices to fraud in 2023 alone, which resulted in hundreds of millions of dollars lost, and this occurs annually.[10]

In the prepaid segment, one of the main fraud control levers—a credit check—is typically not part of the sales transaction in order to give customers with less favorable credit the opportunity to access high quality devices. Customers typically purchase the devices upfront, and carriers like Verizon often significantly discount the purchase price to lower the upfront costs to the customer, with the expectation that the customer will make use of the wireless service for a substantial period of time. Fraudsters are abusing the up-front discount by purchasing the devices with no intention of using the service, making the absolute minimum in service payments to get the phone unlocked, and then reselling the device for profit, typically in international black markets. The Unlocking Rule thus helps fuel the billion-dollar overseas industry in trafficking devices.

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[8] Order, *Service Rules for the 698-746, 747-762 and 777-792 MHz Bands*, WT Docket No. 06-150, ¶¶ 1, 10-11 (June 25, 2019) ("*Verizon Waiver Order*").

[9] *Verizon Waiver Order* ¶ 10.

[10] *See* Declaration Stephen Schwed at 3-4, attached as Exhibit C to Verizon Comments, WT Docket No. 24-186 (Sept. 9, 2024).

At the same time the open access requirement in the C-Block Rule can pose additional risks, including by enabling potentially harmful end-user devices. While the Commission is working to address security risks from consumer devices, the reality is that the Commission's equipment authorization process may not weed out one hundred percent of devices that pose such a risk. Yet the C-Block Rule gives Verizon narrow grounds to exclude the devices of potential bad actors. So long as a developer can meet Verizon's technical standards and testing requirements, and is otherwise legally permitted to obtain Commission equipment authorization, Verizon is required to accept their devices. The C-Block Rule limits Verizon's ability to apply a broader risk framework to exclude bad actors who the Commission and federal government may not yet have sanctioned.

Marketplace and Technological Change. Today's wireless marketplace bears little resemblance to the one that existed when the Commission adopted the C-Block Rule. At that time, as the Commission noted, U.S. wireless providers had just begun "moving beyond" 2G wireless technologies to 3G technologies,[11] and "[a]s part of this evolution, 'cell phones' [we] re evolving into multi-media devices capable of surfing the web, sending e-mails, playing songs, taking pictures, playing games, and streaming video."[12] Today, both the transition from narrowband to broadband wireless, including 4G LTE and 5G networks, and the transition from "cell phones" to smartphones, are complete. Wireless data services are fast and inexpensive.[13] Wi-Fi is ubiquitous.

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[11] *Second C-Block Order* ¶ 197.

[12] *Id*.

[13] *See* Twentieth Report, *Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993*, 32 FCC Rcd 8968, ¶¶ 6-8 (2017) ("*Twentieth Wireless Report*").

The way that wireless phones are sold and paid for also has changed dramatically since adoption of the C-Block Rule, which renders the Unlocking Rule particularly problematic. Back in 2007, wireless providers offering postpaid services generally subsidized all their phones and required customers to sign multi-year service contracts so the costs of those subsidies could be recouped; customers who wished to terminate their service plans before the end of these contracts were subject to early termination fees. Today, by contrast, devices are much more expensive and providers have shifted to selling them on credit, with postpaid customers making monthly payments on the device together with their monthly service plans. This has supplanted long-term contracts and obviated the need for early termination fees. Thus, there is no need for the Unlocking Rule to ensure that customers can switch among wireless providers.

The fact that the marketplace has voluntarily developed industry standards to provide consumer transparency and limit unreasonable locking is further proof that the Unlocking Rule is unnecessary (much less, on a subset of providers). For instance, CTIA's Consumer Code for Wireless Service specifies a one-year locking period for prepaid devices, "consistent with reasonable time, payment or usage requirements."[14] The existence of this code and carrier compliance with it demonstrates that, in a competitive marketplace like the U.S. wireless industry, competitive forces are far better than outdated regulations at balancing the interests of consumers and other stakeholders.

Regulation as a barrier to entry. The Public Notice seeks "comment on whether certain regulations impose costs unequally on large and small businesses or if they unfairly disadvantage American-owned businesses." The C-Block Rule has introduced regulatory asymmetries that

[14] CTIA, *Consumer Code for Wireless Service*, https://www.ctia.org/the-wirelessindustry/industry-commitments/consumer-code-for-wireless-service.

distort the competitive playing field and that harm only a few wireless providers. Verizon became the first provider subject to open access and unlocking requirements when it purchased C-Block spectrum, and the Commission extended those requirements to TracFone when Verizon acquired it in November 2021.[15] The Commission also subjected Mint/Ultra to automatic unlocking requirements as a condition of allowing T-Mobile to acquire these providers earlier this year.[16] This asymmetric treatment results in these providers being the prime target for device traffickers seeking to exploit arbitrage opportunities, which undermines their ability to continue offering these subsidies and therefore also harms consumers. As the Commission has recognized, reducing regulatory asymmetries is important to create an equal playing field that fosters increased competition.[17]

In addition, the open access requirement limits Verizon's flexibility in operating device certification programs, which ultimately can lead to fewer certifications and reduced choice for customers. For practical purposes, the rules require Verizon to set a floor for technical standards and testing irrespective of the developer or, in some cases, the use case for the device. This can limit Verizon's ability to offer streamlined certification tracks for highly credible developers or low-risk use cases, causing certain developers to opt out of certifying their devices for the Verizon network altogether. While the requirement may have been well-intended when it was

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[15] Memorandum Opinion and Order, *Application of Verizon Communications Inc. and América Móvil, S.A.B. de C.V. For Consent To Transfer Control of International Section 214 Authorization*, 36 FCC Rcd 16994, ¶¶ 8, 124 (Nov. 22, 2021) (Verizon agreed to automatically unlock TracFone handsets that operate on its network 60 days after activation).

[16] Memorandum Opinion and Order, *Applications of T-Mobile, US Inc. and Ka'ena Corporation For Consent To Transfer Control of International Section 214 Authorizations*, GN Docket No. 23-171, ¶ 19 (Apr. 25, 2024) (noting that T-Mobile has committed to implementing a 60-day unlocking period for all Mint Mobile and Ultra Mobile devices).

[17] In the Matter of Promoting Consumer Choice and Wireless Competition Through Handset Unlocking Requirements and Policies, WT Docket No. 24-186, FCC 24-77, *NPRM* ¶ 16 (July 19, 2024) ("*Unlocking NPRM*").

adopted in 2007, it certainly is not necessary now. The wireless industry has changed drastically over the past 18 years and Verizon, like all providers, is naturally incentivized to maximize device choice for its network. Market forces and technological evolution push Verizon to apply the right level of technical standards and testing to maintain the security of our network and maximize its value for customers.

Changes in, or other implications of, the governing legal framework. Recent legal developments also undermine the Commission's assertion of authority to adopt the C-Block Rule in the first place. The Rule was adopted on the broadest reading of 47 U.S.C. § 303: the Commission can condition spectrum on anything it finds in the public interest and not inconsistent with the Act.[18] The Supreme Court's recent landmark decision in *Loper Bright* undermines that sustainability of that broad reading.[19] Agencies are no longer afforded judicial deference when it comes to interpreting the bounds of their statutory authority. The President's recent Memorandum calls for agencies to rapidly repeal rules that are unlawful in light of *Loper Bright*, among other recent Supreme Court decisions.[20] The Commission should therefore not only include the C-Block Rule among the rules to delete in this proceeding, but also promptly eliminate it in accordance with the Memorandum.[21]

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[18] *Second C-Block Order* ¶ 207 ("As a general matter, the Commission has the authority to establish license conditions and operational obligations, such as the requirements we adopt here, if the condition or obligation will further the goals of the Communications Act without contradicting any basic parameters of the agency's authority.")

[19] *Loper Bright Enterprises v. Raimondo*, 603 U.S. 369, 412 (2024) ("Courts must exercise their independent judgment in deciding whether an agency has acted within its statutory authority, as the APA requires.").

[20] *See Directing the Repeal of Unlawful Regulations* (Apr. 9, 2025), https://bit.ly/3EfE94R.

[21] And, having eliminated the rule, the Commission should modify C-Block licenses to remove the condition reflected in the rule, as well as any remaining, related merger conditions imposed on Verizon's acquisition of Tracfone.

II. The Commission Should Eliminate Burdensome Aspects of its Discontinuance and Network Change Notification Rules

The four orders the Wireline Competition Bureau issued on March 20, 2025, are an important first step toward removing burdensome rules that have delayed providers' ability to transition from legacy networks and legacy services to the IP-based networks and services that consumers demand.[22] The Commission should build on those efforts in this proceeding, as USTelecom and CTIA explain in their comments. One helpful additional step would be for the Commission to eliminate the rules it waived in its those orders—making the relief it granted permanent. But, given that legacy voice continues to dwindle rapidly, rather than continuing to tweak the tests for streamlined discontinuance, the Commission should take more substantial steps to foster the transition to modern broadband networks. For example, the Commission has granted blanket authority under Section 214 of the Communications Act for carriers to enter markets and it could similarly grant blanket authority to exit.[23]

Or, the Commission could use its Section 10(c) authority to forbear from application of Sections 214(a) - (d) of the Communications Act to achieve a similar, deregulatory result.[24] Taking these actions would directly result in more broadband being available to more people in more places as carriers would no longer have to maintain yesterday's networks. Additionally,

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[22] Order, *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, DA 25-248, WC Docket No. 17-84, GN Docket No. 13-5 (Wireline Comp. Bur. Mar. 20, 2025); Order, *Technology Transitions*, DA 25-250, GN Docket No. 13-5 (Wireline Comp. Bur. Mar. 20, 2025); Order, *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, DA 25-251, WC Docket No. 17-84 (Wireline Comp. Bur. Mar. 20, 2025); Order, *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, DA 25-252, WC Docket No. 17-84 (Wireline Comp. Bur. Mar. 20, 2025).

[23] Second Memorandum Opinion & Order, I*mplementation of Section 402(b)(2)(A) of the Telecomm. Act of 1996*, FCC 99-104, CC Docket No. 97-11, FCC Rcd 11364, para. 2 (1999).

[24] 47 U.S.C. § 160(a)(1)-(3).

knowing that exit from a marketplace is possible without undue regulatory burdens will incentivize additional entry.

III. The Commission Should Eliminate Burdensome Aspects of its Broadband Mapping Rules

Verizon supports the Commission's broadband mapping efforts and recognizes the importance of accurate and reliable maps. However, the existing rules governing the maps are unduly burdensome in a number of ways. The Commission could reduce those burdens — freeing provider resources to invest in broadband without compromising the value of the maps.

One such unduly burdensome rule is the requirement to submit maps for wireless technologies that predict in-vehicle coverage, in addition to maps that predict outdoor coverage. This requirement doubles the number of coverage maps providers must create, increasing the burdens of creating the maps and responding to challenges. Making meaningful in-vehicle maps requires making assumptions about the kind of vehicle, the position of the device within the vehicle, its orientation, whether the windows or roof are up or down, and the vehicle speed. All those same variables are also relevant to any challenges and responses to challenges, as differences between test conditions (including differences between the test vehicles) affect speed measurements and thus complicate the challenge process. Requiring multiple maps per wireless technology also causes consumer confusion about which maps pertain to them. By contrast, outdoor stationary maps provide clear and sufficient information broadband coverage.

The Commission should also eliminate the requirement that providers have a professional engineer ("PE") certify their broadband map filings. As the Commission's staff recognized in waiving this requirement multiple times over the past several years, there simply are not enough professional engineers who specialize in Radio Frequency ("RF") engineering and broadband

network design.[25] That is why the Commission, last year, proposed to permanently eliminate the requirement.[26] The Commission should carry through on that proposal. Mobile and fixed providers have demonstrated that they can sufficiently certify broadband map information with otherwise qualified engineers that possess all requisite expertise but lack a PE license. Given the continuing shortage of licensed PEs, permanently eliminating the certification requirement would provide certainty to providers regarding their certification obligations and avoid the need to continue using piecemeal waivers to address this persistent shortage. In eliminating the requirement, the Commission should not impose the data retention conditions that it had attached to the prior waivers. The permanent elimination of an outdated certification requirement does not justify the addition of a new data retention requirement.

IV. The Commission Should Eliminate Delays in the Infrastructure Permitting Process

Verizon fully supports CTIA's recent petition for rulemaking proposing revisions to the Commission's NEPA rules.[27] As CTIA explains, many of the Commission's rules date back decades, with the last substantive revision in 2018. Those rules are out of date with current law and Administration policy and unnecessarily burden new wireless deployments, delaying the benefits of newer, faster wireless broadband services to Americans. As CTIA explains, the current NEPA rules impose lengthy deployment delays, increase providers' costs (which can pull limited capital resources away from other needed deployments and network enhancements), and, in some cases, cause providers to decide not to deploy at a given location.

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[25] Fourth Report and Order, Declaratory Ruling, and Fourth Further Notice of Proposed Rulemaking, *Establishing the Digital Opportunity Data Collection*, 39 FCC Rcd 7539, ¶ 97 (2024).

[26] *See id.* ¶ 100.

[27] *See* Petition for Rulemaking, *Petition for Rulemaking To Update Part 1, Subpart I of the Commission's Rules Implementing the National Environmental Policy Act*, RM-12003 (Mar. 27, 2025).

To remove those burdens, the Commission should, as CTIA explains, adopt rules that make clear that wireless facility deployments pursuant to a geographic area license that do not require antenna structure registration are not major federal actions under NEPA. And it should amend its rules to ensure that any facilities that remain governed by NEPA are subject to a review process with clear timelines and predictable standards. Taking these steps and the others detailed in CTIA's petition will reduce impediments to the deployment of wireless broadband networks, pave the way for enhanced United States leadership in advanced wireless broadband services, and help ensure that wireless providers' limited capital resources are used efficiently to close the digital divide.

V. The Commission Should Eliminate Obligations to Maintain and Support the Last Vestigial Parts of the Unbundled Network Element Regime

Over the past 20 years, the Commission has dismantled, through forbearance or other means, most of its rules implementing the misguided Unbundled Network Element (UNE) regime.[28] Most recently, in 2020, the Commission ratified a cross industry agreement to phase out nearly all of the remaining UNEs.[29] However, several were left in place. For Verizon, demand for the remaining UNEs is low and is diminishing rapidly—with fewer than 500 UNE loops remaining across Verizon's entire footprint. Many remaining UNEs have zero customers. But the UNE rules require incumbent carriers like Verizon to maintain the network infrastructure, expertise, and operations support systems necessary to offer, provision, maintain, repair, and bill UNEs. When the Commission eliminated certain UNE obligations in 2019, it explained that the UNEs were "not being used as a foothold for new entrants into the marketplace" but instead are

[28] Report and Order, *Modernizing Unbundling and Resale Requirements in an Era of Next-Generation Networks and Services,* 35 FCC Rcd 12425 ¶¶ 15-19 (2020) ("*2020 UNE Order*").

[29] *Id.* ¶ 24.

"trapping incumbent LECs into preserving outdated technologies and services at the cost of a slower transition to next generation networks and services that benefit American consumers and businesses."[30] The same reasoning applies to the remaining UNEs—they are not being used to enter markets and offering them requires preserving extremely outdated and costly technology. Accordingly, the Commission should review its remaining UNE rules with the goal of streamlining or eliminating them.[31]

CONCLUSION

For the foregoing reasons, the Commission should eliminate or modify the rules detailed in the USTelecom and CTIA comments, including 47 C.F.R. § 27.16, discontinuance, network change notice, and broadband mapping rules.

[30] Memorandum Opinion and Order, *Petition of USTelecom for Forbearance Under 47 U.S.C. § 160(c) to Accelerate Investment in Broadband and Next-Generation Networks,* 34 FCC Rcd 6503, ¶ 3 (2019).

[31] *See*, *e.g.*, 47 C.F.R. § 51.319. In its review of the UNE rules the Commission should not disturb the UNE transitions underway, such as the transitions adopted in the Commissions's *2020 UNE Order*.

Respectfully submitted,

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